

IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

CURTIS L. DRAFTON,

Plaintiff,

vs.

SELMA PRODUCTIONS, INC., CYNTHIA  
F. STILLWELL PROMOTIONS, INC.,  
CYNTHIA FRITTS STILLWELL, LLC, and  
CYNTHIA F. STILLWELL,

Defendants.

Civil Action No. 2014cv248832

**MOTION FOR DEFAULT JUDGMENT**

Curtis L. Drafton, Plaintiff in the above-styled matter, by and through the undersigned counsel, files this Motion for Default Judgment pursuant to O.C.G.A. § 9-11-55, and shows the Court as follows:

1.

Defendant Cynthia Fritts Stillwell, LLC, was served with process of the Summons and Complaint through its registered Agent, Kate Strain on July 27, 2014.

2.

Attached hereto and incorporated herein as Exhibit "1" is a true and correct copy of the Chatham County Sheriff's Department's Affidavit of Service, which was previously filed with this Court on August 11, 2014.

3.

In the nearly 5 months since it was served, there has been no attempt by Defendant Cynthia Fritts Stillwell, LLC, to open this default by the filing of an Answer or any other responsive pleading. See Affidavit of Charles R. Bridgers, attached hereto as Exhibit 2.

4.

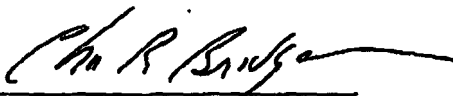
Pursuant to O.C.G.A. §9-11-55(a), Defendant Cynthia Fritts Stillwell, LLC, is in automatic default with regard to all issues of liability damages and the right to attorney's fees and expenses of litigation based on its failure to file an Answer to the above-styled claim within thirty (30) days of service, or to reopen default within forty-five (45) days of service.

WHEREFORE, Plaintiff moves this Court to enter an Order that all issues of liability, damages, and the right to attorney's fees and expenses of litigation regarding Defendant Cynthia Fritts Stillwell, LLC, are determined against said Defendant and in favor of Plaintiff, just as if every item and paragraph of the Complaint were supported by proper evidence and that this matter be set down for trial without a jury in open court or in chambers for the purpose of determining damages.

This 23<sup>rd</sup> day of December 2014.

3100 Centennial Tower  
101 Marietta Street  
Atlanta, Georgia 30303  
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[kevin.fitzpatrick@dcbflegal.com](mailto:kevin.fitzpatrick@dcbflegal.com)  
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DELONG CALDWELL BRIDGERS  
& FITZPATRICK, LLC

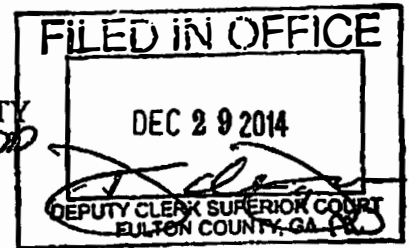


Charles R. Bridgers  
Ga. Bar No. 080791  
Kevin D. Fitzpatrick, Jr.  
Ga. Bar No. 262375

*Counsel for Plaintiff*

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STATE OF GEORGIA



**CURTIS L. DRAFTON,**

**Plaintiff,**

**vs.**

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CYNTHIA FRITTS STILLWELL, LLC, and  
CYNTHIA F. STILLWELL,**

**Defendants.**

Civil Action No. 2014cv248832

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a true and correct copy of the within **MOTION FOR  
DEFAULT JUDGMENT** by U.S. Mail with sufficient postage affixed to:

Cynthia Fritts Stillwell, LLC  
c/o Kate Strain  
2905 Bull Street  
Savannah, GA 31405

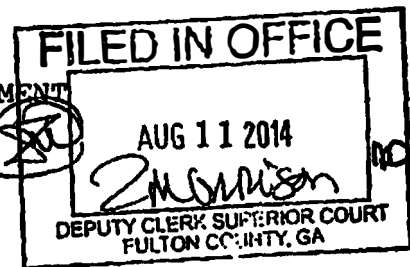
This 23<sup>rd</sup> day of December 2014.

**DELONG CALDWELL BRIDGERS  
& FITZPATRICK, LLC**

Charles R. Bridgers  
Ga. Bar No. 080791

MCB  
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CHATHAM COUNTY SHERIFF'S DEPARTMENT  
SHERIFF AL ST LAWRENCE  
P. O. BOX 10026  
SAVANNAH, GEORGIA 31412  
TELEPHONE: (912) 652-7634  
2014 CV 248832



STATE OF GEORGIA  
COUNTY OF CHATHAM

AFFIDAVIT OF SERVICE

Personally appeared before the undersigned Notary Public of  
said State and County, Deputy Lester Ellerbe, who under oath,  
states that he is a Deputy with the Chatham County Sheriff's Office,  
under the Sheriff Al St Lawrence.

Deponent further states under oath that he made a Corporate  
Service on: Cynthia Fritts Stillwell, LLC, C/O Kate Strain,  
on the date of: July 27, 2014.

In the case of: Curtis Drafton v. Selma Productions, Inc. et. al.  
Per the Deputy, Kate Strain was served.

L. Ellerbe 767  
Deputy Sheriff, Chatham County, GA

Sworn to and subscribed before me:  
This 31st day of July, 2014.

Janelle Rhett Belton  
Notary Public, Chatham County, GA

JANELLE RHETT BELTON  
Notary Public, Chatham County GA  
My Commission Expires June 5, 2016

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and CYNTHIA F. STILLWELL,**

**Defendants.**

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**AFFIDAVIT OF CHARLES R. BRIDGERS**

**Charles R. Bridgers, attorney for Plaintiff Drafton, makes the following statement under oath pursuant to Rule 15 of the Unif.R.Sup.Court:**

1.

Along with Kevin D. Fitzpatrick, Jr., I am serving as co-lead counsel in the above-styled case. I make this declaration based upon my personal knowledge of the facts in support of Plaintiff's Motion for Default Judgment.

2.

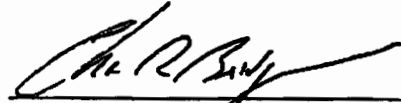
In the nearly 5 months since Defendant Cynthia Fritts Stillwell, LLC, was served with process in this case, I am aware of no attempt by that Defendant to open this default by the filing of an Answer or any other responsive pleading.

3.


Furthermore, neither I nor my co-counsel have received any communication from Defendant Cynthia Fritts Stillwell, LLC.

[signature page follows]

FURTHER AFFLIANT SAYETH NAUGHT.

  
Charles R. Bridgers

Sworn and subscribed before me  
this 22<sup>nd</sup> day of December 2014.

  
Notary Public  
My Commission Expires: 6/20/2017